

1 Gregory M. Fox, State Bar No. 070876
2 BERTRAND, FOX & ELLIOT
3 The Waterfront Building
2749 Hyde Street
4 San Francisco, California 94109
Telephone: (415) 353-0999
Facsimile: (415) 353-0990

5 Teresa L. Highsmith – State Bar No. 155262
6 Office of the City Attorney
2263 Santa Clara Avenue, Room 280
7 Alameda, California 94501-4477
Telephone: (510) 747-4750
Facsimile: (510) 747-4767

8 Attorneys for Defendants
9 CITY OF ALAMEDA POLICE DEPARTMENT.

10 UNITED STATES DISTRICT COURT

11 NORTHERN DISTRICT OF CALIFORNIA

13 TSOGBTAYAR SANDAGDORJ,) Case No.: C-06-4995 TEH
14 Plaintiff,)
15 vs.)
16 CITY OF ALAMEDA POLICE)
DEPARTMENT; OFFICER S. BRENNAN)
#512; OFFICER CRUZ #510; AND DOES 1-)
100. Jointly and Severally,)
18 Defendants.)
19 _____)

20 The parties, acting by and through their respective attorneys, appeared for the Initial Case
21 Management Conference on January 8, 2007. At that time plaintiff's counsel requested permission to
22 file a First Amended Complaint. Defendants had no objection to the amending of the Complaint and
23 informed the Court that it would provide additional information to the plaintiff's counsel regarding
24 the lack of involvement by the named defendants Brennan and Cruz so that plaintiff may consider
25 dismissing them from the action. Because of illness this week on the part of the Inspectional Services
26 Sergeant who was to provide a declaration documenting the lack of involvement by the individual
27 defendant jailers, the defendant City will provide his declaration to plaintiff's counsel on or before
28 the initial ENE conference call on January 17, 2007. Plaintiff will file his First Amended Complaint

1 on or before January 24, 2007. Defendants' responsive pleading to be filed on or before Friday
2 February 2, 2007.

3 A further Case Management Conference will take place on Monday April 2, 2007 at 1:30 pm.

4 A joint Case Management Conference Statement to be filed on or before March 26, 2007.

5
6 So Stipulated:

7
8 Dated: January 11, 2007

By: _____/s/

9 Hume Joseph Jung
10 Attorney for Plaintiff

11
12 Dated: January 11, 2007

BERTRAND, FOX & ELLIOT

13
14 By: _____/s/

15 Gregory M. Fox
16 Attorneys for Defendants
17 ALAMEDA POLICE DEPT. and
18 OFFICERS EMMANUEL CRUZ and
19 S. BRENNAN

20
21 GOOD CAUSE APPEARING THE STIPULATION IS SO ORDERED

22 Dated: January 17, 2007

23 THELTON E. HENDERSON
UNITED STATES

24 ATTORNEY ATTESTATION

25 I hereby attest that I have on file all holograph signatures for any signatures indicated by a
26 "conformed" signature (/s/) within this E-filed document.

27 Dated: January 11, 2007

28 /s/
Gregory M. Fox

